

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ZEO Health Ltd.; Micah Portney; Touchstone
Life Essentials, Inc.; and Norwood E. Stone,

Plaintiffs,

v.

ZOI Global, LLC; Lori R. Lee; Denise
Stephens; Metron Nutraceuticals, LLC; and
Nikolaos Tsirikos-Karapanos,

Defendants.

Case No.: 2:21-cv-11410 (ES)(MF)

**NOTICE OF MOTION TO DISMISS
FOR LACK OF PERSONAL
JURISDICTION**

Return Date: September 20, 2021

ORAL ARGUMENT REQUESTED

TO: Dariush Keyhani
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Attorney for Plaintiffs

PLEASE TAKE NOTICE that on September 20, 2021, at 10:00 a.m. or soon thereafter as counsel may be heard, Defendants Metron Nutraceuticals, LLC (“***Metron***”) and Nikolaos Tsirikos-Karapanos (collectively, “***These Defendants***”) will move this Court for an Order dismissing Plaintiffs claims against These Defendants as alleged in Plaintiffs’ Amended Complaint [ECF No. 5] for lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12 and Local Rule 7.1.

PLEASE TAKE FURTHER NOTICE that These Defendants shall rely upon their Brief in Support of Motion to Dismiss for Lack of Personal Jurisdiction and the Declaration of Nikolaos Tsirikos-Karapanos, all of which are served herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is included and *oral argument is requested.*

Dated: September 3, 2021

Respectfully submitted,

/s/ Colin Hackett

Colin Hackett

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*Counsel for Defendants, Metron Nutraceuticals,
LLC and Nikolaos Tsirikos-Karapanos*

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2021, I caused the Notice of Motion, Metron's Brief in Support of Motion to Dismiss for Lack of Personal Jurisdiction, the Declaration of Nikolaos Tsirikos-Karapanos, a proposed form of order, and this certificate of service to be served upon all counsel of record by filing same through the CM/ECF Electronic filing system of the United States District Court for the District of New Jersey.

Dated: September 3, 2021

Respectfully submitted,

/s/ Colin Hackett

Colin Hackett

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